



Lawrence Livermore National Laboratory

May 15, 2007

Ms. Luz Castillo
Standardized Permitting and Corrective Action
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2721

Subject: **Response to the 2006 Compliance Evaluation Inspection Report,
Livermore Site, Lawrence Livermore National Laboratory**

Reference: Letter from Ms. Luz T. Castillo, DTSC to Ms. Stephanie Goodwin,
Dated April 16, 2007

Dear Ms. Castillo:

This letter is being submitted as a response to the Inspection Report dated April 16, 2007, resulting from the Compliance Evaluation Inspection (CEI) that the Department of Toxic Substances Control (DTSC) conducted at Lawrence Livermore National Laboratory (LLNL) on September 27, 28, and 29, and October 2, 6, and 11, 2006. In your letter, you cite three new Minor Violations and request that LLNL complete corrective actions for these violations in 20 days and notify the DTSC within 30 days. As requested, LLNL's responses and corrective actions are as follows:

1. Failure to Provide Annual Training

LLNL violated California Code of Regulations, title 22, section 66264.16 (c) in that the facility failed to provide the required annual training, to wit:

- a. On or about 05/11/04, 04/29/05 and 04/04/06, John Bowers took a 0.5 hour web-based course HS1670-W, Qualification for Fire Extinguisher Users, instead of the 1.0 hour, HS1670-CBT (computer based training), as specified in the approved Training Matrix, Part B, Volume 5, Appendix VII-A, Rev. December 2005.
- b. On or about 02/27/04, 01/19/05 and 01/03/06, Scott Graham took a 0.5 hour web-based course HS1670-W, Qualification for Fire Extinguisher Users, instead of the 1.0 hour, HS1670-CBT (computer based training), as specified in the approved Training Matrix, Part B, Volume 5, Appendix VII-A, Rev. December 2005.

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(925) 422-4750 - Fax (925) 423-9365*

SSG/PY:jh – PRA07-040

LLNL's Response to Minor Violation 1

In regard to this training violation, LLNL believes that the substitution of training class HS1670-W for course HS1670-CBT is allowed. The LLNL Part B permit was modified December 23, 2002 to allow RHWM limited flexibility to adapt our formal training plan to take advantage of new technologies. The class in question, *Qualification for Fire Extinguisher Users* was modified from computer-based training using a video disc to a web-based class. Although it has a different listed course suffix and time length, the content and learning objectives did not vary and are considered equivalent to the nominal class listed in the Part B, Vol. 5/Appendix VII-B. Substitution of this equivalent course is allowed under our permit, Volume 1, Part 7, Section 7, Training Techniques and Development. This permit modification language, which was approved by DTSC in a letter dated March 23, 2002 (see Attachment 1), included the following for inclusion in the Part B: ***"Methods used to deliver a course may evolve to take full advantage of advances in training technology and methodology. When new applications of current training technologies or when new technologies or methodologies are identified, courses may be adapted accordingly. However, content and learning objectives will not vary. In the case of existing courses, courses delivered through alternative media (web-based or video-based, for example) are considered equivalent to their application counterpart. To better identify the methodology used, suffixes will be added to course numbers. For example, if EP0006-HZ (which is currently a lecture-based course) became web-based, the new course number (i.e., EP0006-HZW) would be equivalent to EP0006-HZ. The use of suffixes will enable better tracking of courses internally as well as externally by outside agencies."***

Although DTSC regulations do not require course length beyond the description of the course type and amount as specified in 22 CCR 66264.16 (d)(3), LLNL included course duration as additional information in the Part B. For further clarification, LLNL submitted a permit modification approved by DTSC on March 14, 2007, in which we requested the duration of all E-learning courses to be "variable." See item 4 in the March 14, 2007 DTSC approval letter included as part of **Attachment 1**.

Based on the explanation above, LLNL is requesting that this minor violation be rescinded.

2. Failure to Include Incident Commander Duties

LLNL violated California Code of Regulations, title 22, section 66264.16 (d) (2) in that, on or about September 27, 2006, LLNL failed to include John Bowers' job duties as Waste Treatment Group Leader, and his additional responsibility as an Incident Commander for small incidents in Areas 514, and 695 Storage and Treatment Unit Group. Mr. Bowers is on the Emergency Call list in the RHWM Contingency Plan, Rev. July 2004.

LLNL's Response to Minor Violation 2

LLNL will include emergency response duties of the Waste Treatment Group Leader in the Part B, Volume 5, Appendix VII-A, which will be submitted to DTSC as a Class 1 permit modification as shown in **Attachment 2**.

In addition, as a comprehensive resolution of this issue, another permit modification to the Contingency Plan, Part B, Volume 6, will be submitted to DTSC to clarify LLNL's position that the Fire Chief and Deputy Fire Chief are the Incident Commanders (Emergency Coordinators) for all incidents requiring the implementation of the Contingency Plan. The Storage and Disposal and the Waste Treatment Group Leaders are not Incident Commanders; they only provide emergency response guidance.

3. Failure to Include the Time of Inspection

LLNL violated California Code of Regulations, title 22, section 66264.16 (d) in that, on or about 10/06/05, 01/05/06, 01/19/06, 07/05/06, 10/05/06, LLNL failed to include the time of inspection on the inspection log for inactive facilities – Container Storage Unit 233, Building 419, and Area 514.

LLNL's Response to Minor Violation 3

LLNL understands the applicability of the requirements of title 22, section 66264.16 (d) to facilities that actively manage regulated waste that could be released into the environment. However, all three inactive facilities (Container Storage Unit 233, Building 419, and Area 514) are undergoing closure and are no longer used to manage regulated wastes. On May 20, 2005, LLNL sent a letter to DTSC requesting reduced inspection frequency and scope that specifically excluded time from the inspection log template that was submitted with the request letter. On August 19, 2005, DTSC sent an approval letter for reduced quarterly inspections and specified the focus of such inspections at the inactive facilities, without any changes to the inspection log LLNL had submitted for review and approval. Copies of our request letter and your response are included as **Attachment 3**.

Based on the explanation above, LLNL requests that DTSC rescind this minor violation.

Please contact me at (925) 422-4750 if you have any questions regarding this response.

Sincerely,

Stephanie S. Goodwin
Department Head
Environmental Protection Department

Attachments: (1) DTSC Permit Mod Approval Letters of December 23, 2002 and March 14, 2007
(2) Updated section of the Part B, Volume 5, Appendix VII-A to include Waste Treatment Group Leader Emergency Response Duties
(3) Reduced Inspection Request Letter and DTSC's Approval Letter of August 19, 2005

Attachment 1

**DTSC Permit Mod Approval Letters of
December 23, 2002 and March 14, 2007**



Department of Toxic Substances Control



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Edwin F. Lowry, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Gray Davis
Governor

December 23, 2002

01-02-03A10:50 RCVD

Ms. Ellen Raber
Department Head
Environmental Protection Department
Lawrence Livermore National Laboratory
P.O. Box 808, L-668
Livermore, California 94551-0808

Dear Ms. Raber:

The Department of Toxic Substances Control (DTSC) has reviewed Lawrence Livermore National Laboratory's (LLNL) November 9, 2001 request for three Class 2 Permit Modifications which was included in the modification request package along with fourteen (14) Class 1* and twenty-nine (29) Class 1 permit modification requests. The Class 1 and 1* requests were previously approved by DTSC on December 9, 2001 and July 26, 2002 respectively.

The first Class 2 request is to add the following thirty-two (32) new Environmental Protection Agency (EPA) Hazardous Waste Codes to the Part A Application (EPA Form 8700-23) of the LLNL Permit: P128, P185, P188, P189, P190, P191, P192, P194, P196, P197, P198, P199, P201, P202, P203, P204, P205, U278, U279, U280, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409, U410, and U411.

The second Class 2 request is to specify the minimum separation distance for the storage of incompatible solid wastes at 2.5 feet. The LLNL Permit prior to the modification incorrectly specified a separation distance of 8 feet, which is the distance required for liquid waste.

The third Class 2 request would allow the use of alternate methods and media in the LLNL training plan.

Pursuant to California Code of Regulations, title 22, section 66270.42, DTSC approves these three Class 2 Permit Modifications to LLNL's Hazardous Waste Facility Permit Number 99-NC-006. A copy of the modified Permit is enclosed. Details of the Class 1, Class 1*, and Class 2 permit modifications are provided in Appendix A of the Permit.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

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LLNL held a 60-day Comment Period and a Public Meeting for the Class 2 Permit Modifications. The Comment Period began on January 5, 2002, and ended on March 7, 2002. The Public Meeting, sponsored by LLNL, was held at the LLNL Visitor Center Reading Room, 7000 East Avenue, Livermore, California at 6:30 p.m. on January 31, 2002. Enclosed is a Response to Comments received at the Public Meeting. No other written comments were received during the comment period.

To comply with the California Environmental Quality Act for these Class 2 Permit Modifications, DTSC has prepared three separate Notices of Exemption (NOE), under California Code of Regulations, title 22, section 15061(b) (3). This section allows activities which have no possibility of having a significant effect on the environment.

Please provide two sets of replacement pages for the Operation Plan affected by the Class 2 permit modifications, as well as the modified Part A Application (EPA Form 8700-23), within thirty days of the date of this approval letter. Should you have any questions, please contact Mr. Mike Stanek, of my staff, at (916) 255-6699.

Sincerely,

Mohinder S. Sandhu, P.E.
Chief
Standardized Permits and Corrective Action Branch

Enclosures

cc: Ms. Marylia Kelley (w/enclosures)
Executive Director
Tri-Valley CAREs
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Livermore, California 94551

Ms. Charlene Williams, Chief (w/enclosures)
Northern California Branch
Statewide Compliance Division
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
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Ms. Ellen Raber
December 23, 2002
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cc: Mr. Mike Stanek, P.E.
Hazardous Substances Engineer
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Department of Toxic Substances Control
8800 Cal Center Drive
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Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
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Arnold Schwarzenegger
Governor

March 14, 2007

Mr. Phillip E. Hill
Technical Deputy for
Safety and Environmental Programs
National Nuclear Safety Administration
Livermore Site Office
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Livermore, California 94551-0808

Mr. William A. Bookless
Associate Director
Safety and Environmental Protection
Lawrence Livermore National Laboratory
P. O. Box 808
Livermore, California 94551-0808

RESPONSE TO PERMIT MODIFICATIONS REQUESTED ON FEBRUARY 6, 2007,
LAWRENCE LIVERMORE NATIONAL LABORATORY, EPA ID. NO. CA2890012584

Dear Mr. Hill and Mr. Bookless:

The Department of Toxic Substances Control (DTSC) has reviewed your permit modification notification, dated February 6, 2007, requesting ten Class 1 modifications to the Hazardous Waste Facility Permit for the Lawrence Livermore National Laboratory (LLNL). The notification was received by DTSC on February 14, 2007. All of the modifications are for the Training Plan and the individual items are addressed as follows:

1. Change some references from "EPD Training Section" to "RHWM Training Team" and replace some "EP" prefixes with "RH" on the course numbers.
2. Add the following new job titles:
 - a. Material Storage Technician Contractor to the Storage and Disposal Group
 - b. Nuclear Facilities Operations Supervisor in the Storage and Disposal Group

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- c. Nuclear Facilities Operations Supervisor in the Waste Treatment Group
3. Rename the following courses:
- a. EP51220-010 "Building 612 Drum/Container Crushing Unit" becomes "Drum/Container Crushing Unit.
 - b. EP5120-011 "Building 612 Lab Packing Container Storage Unit" becomes "Lab Packing Container Storage Unit"
 - c. EP5120-055 "Building 695 Waste Water Filtration Module" becomes "Building 695 Rotary Drum Filtration Unit"
4. Specify "variable" as the course duration for Electronic Learning (E-Learning), on the job training (OJT), reading assignments, and courses requiring demonstration of practical competence.
5. Update the Training Plan to correct typographical errors and omissions.
6. Delete the following obsolete courses:
- a. EP5120-043 Vacuum Blasting Maching
 - b. EP5070-002 Laboratory Fingerprint Testing
7. Remove the training requirement for HS5690, Incidental Crane Safety, from the following positions:
- a. Field Operations Supervisor
 - b. Field Technician
 - c. Sampling Technician Contractor
 - d. Sampling Technician Lead
8. Change the description of the job duties associated with a specific job title "Waste Generator Services Group Leader."
9. Delete the Facility Safety and Compliance (FSC) Group Leader position from the Training Plan.

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10. Delete the following 14 job titles:

- a. Area 612 Storage Technician
- b. Area 612 Storage Technician Contractor
- c. Characterization Chemist Assistant
- d. Characterization Chemist Associate
- e. Field Operations Team Leader
- f. Field Operations Technician I
- g. Legacy Waste Technician
- h. Radiological Characterization Analyst
- i. Radiological Characterization Analyst Associate
- j. Radiological Characterization Assistant
- k. Storage and Disposal Deputy Group Leader
- l. Storage Operations Team Leader
- m. Waste Treatment Operations Supervisor
- n. Waste Generator Services Deputy Group Leader

DTSC concurs that these modifications to the Training Plan are Class 1 modifications as defined in California Code of Regulations, title 22, section 66270.42.

Pursuant to California Code of Regulations, title 22, section 66270.42(a) these ten Class 1 permit modifications become effective on March 16, 2007. In accordance with California Code of Regulations, title 22, section 66270.42(a)(1)(B), LLNL is required to send a public notice of the modifications within 90 days after the change is put into effect. Please notify DTSC when each change is put into effect and submit a copy of each public notice to DTSC.

DTSC has determined that these Class 1 permit modifications are not projects subject to the provisions of the California Environmental Quality Act (CEQA) as defined in California Code of Regulations, title 14, section 15378.

DTSC has not prepared a modified permit document at this time. DTSC intends to prepare a modified permit when it issues the final decisions for the Class 2 permit modifications submitted on November 21, 2006. At that time DTSC will also incorporate all other permit modifications approved since December 9, 2005, which was the last time a modified permit document was prepared.

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Mr. William A. Bookless
March 14, 2007
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Should you have any questions concerning this letter, please contact Mr. Paul Ruffin of my staff at (916) 255-6677 or at pruffin@dtsc.ca.gov.

Sincerely,

Mohinder S. Sandhu, P.E., Chief
Standardized Permitting and Corrective Action Branch

Enclosures

cc: Mr. Wen Kao
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Ms. Luz Castillo
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Mr. William A. Bookless
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cc: Mr. Eric Maher
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Mr. Paul Ruffin
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Attachment 2

**Updated section of the Part B, Volume 5,
Appendix VII-A to include Waste Treatment
Group Leader Emergency Response Duties**

Appendix VII-A

Radioactive and Hazardous Waste Management Division Personnel Job Titles, Duties, and Training Programs

Table 1 Continued)

Job Title	Job Duties
Waste Generator Services Group Leader	Manages staff responsible for hazardous waste characterization/certification, and technicians involved in field operations. Oversees the development and maintenance of LLNL hazardous waste. Reviews and approves waste acceptance documentation and statements. Coordinates the notification of appropriate personnel of modifications, additions, and deletions to processes, procedures, and documents.
Waste Management Environmental Analyst	Provides technical input and guidance to the RHW Division to ensure compliance with local, state, federal, and DOE regulatory requirements; ensures RHW Division waste management practices meet acceptance requirements of off-site treatment/disposal sites; performs assessments of Radioactive and Hazardous Waste Management Facilities for compliance with local, state, DOE and other federal regulatory requirements; prepares and reviews reports, surveys, and communications as required to comply with local, state, and federal regulatory requirements.
Waste Treatment Chemist	Reviews decontamination and waste treatment processes. Assists with the investigation of new processes for decontamination and waste treatment processes. Assists with feasibility studies on new processing units and techniques. Prepares reports as required.
Waste Treatment Group Leader	Manages engineers and technicians who design, implement, install, and maintain various computer systems, instrumentation, and control electronics used to treat hazardous, radioactive and mixed wastes; performs hazardous, radioactive, and mixed waste treatment activities; performs staffing functions, evaluates employee performance; prepares and manages budgets; assists with training activities; <u>provides emergency response and cleanup guidance at the main site and Site 300; reviews procedures and documents affecting RHW Division.</u>
Waste Treatment Operations Supervisor	Oversees the day-to-day activities of the Waste Treatment and Waste Treatment Support Technicians. Responsibilities include scheduling work and training activities, providing job-specific training and guidance, preparing job-related documentation and reports, conducting meetings on task scheduling and safety-related issues, ensuring work is performed safely, and other operationally related activities as directed by RHW Division management.
Waste Treatment Support Technician	Supports day-to-day hazardous, radioactive, and mixed waste treatment activities by assisting the Waste Treatment Technician with hazardous and mixed waste storage, treatment, and shipping operations.
Waste Treatment Support Technician Contractor	Supports day-to-day hazardous, radioactive, and mixed waste treatment activities by assisting the Waste Treatment Technician with hazardous and mixed waste storage, treatment, and shipping operations.
Waste Treatment Technician	Performs day-to-day hazardous and mixed waste treatment activities. Operates hazardous and mixed waste treatment equipment (such as solidification and liquid waste treatment units), receives waste, segregates or bulks waste as necessary, packages waste, and places it into storage or prepares it for off-site shipment, and performs Radioactive and Hazardous Waste Management Facility inspections.

Attachment 3

**Reduced Inspection Request Letter and DTSC's
Approval Letter of August 19, 2005**



Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

8800 Cal Center Drive
Sacramento, California 95826-3200



Arnold Schwarzenegger
Governor

August 19, 2005

Ms. Stephanie Goodwin, Division Leader
Radioactive and Hazardous Waste Management
Lawrence Livermore National Laboratory
P.O. Box 808, L-623
Livermore, California 94551-0808

CHANGING INSPECTION FREQUENCY AT BUILDINGS 233, 419, AND 514 LAWRENCE LIVERMORE NATIONAL LABORATORY (LLNL)

Dear Ms. Goodwin:

The Department of Toxic Substances Control (DTSC) has reviewed the Lawrence Livermore National Laboratory (LLNL) request dated May 20, 2005 to reduce the frequency and the scope of inspections for three buildings which are in the process of being closed. The buildings in question are Buildings 233, 419, and 514. There are no waste activities being performed in these areas (i.e., handling, processing, repackaging, storage or staging) and all associated equipment have been removed from the buildings.

The Department hereby approves the suggested reduction to quarterly inspections of these inactive facilities. The inspections will focus on assuring that all access points are posted with appropriate warning signs legible from a distance of 25 feet, that all gates/doors are secured to prevent unauthorized entry, and that there is no sign of storm water run-off from the facility. This level of inspection complies with the requirements of Health and Safety Code, Sections 25200.5(k)(1) & (2) and California Code of Regulations, title 22, sections 66265.15(a) and 66265.15(b)(4).

Should you have any questions, please contact Mr. Mike Stanek at (916) 255-6699.

Sincerely,

Rao Akula, P.E., Chief
Sacramento Unit
Standardized Permitting and Corrective Action Branch

cc: See next page.



Lawrence Livermore National Laboratory

Environmental Protection Department

May 20, 2005

Mr. Mike Stanek, P.E.
Hazardous Substance Engineer
Standardized Permits and Corrective Action Branch
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826

**SUBJECT: Changing Inspection Frequency at Buildings 233 and 419 and Area 514
Lawrence Livermore National Laboratory (LLNL)**

Dear Mr. Stanek:


Lawrence Livermore National Laboratory (LLNL) has previously submitted the Closure Plans for Buildings 233 and 419 and Area 514 to DTSC for review and approval. Because these three facilities are no longer in operation, LLNL will reduce the frequency of the inspections to quarterly as well as reduce the scope of the inspections. Attached to this letter, please find the form LLNL plans to use for the inspections. The form specifies the changes applicable to all three facilities.

The following are the reasons LLNL plans to reduce the scope and the frequency of inspections at Buildings 233 and 419 and Area 514:

- All three areas are inactive facilities no longer used to manage hazardous or mixed waste.
- Any potentially contaminated structures have been removed or are contained within the building, and a release into the environment is unlikely.
- The facilities are within a fenced and gated area within the LLNL perimeter, which itself is fenced and under a 24-hour security surveillance.
- Access to these areas by non-hazardous waste management personnel is strictly limited.
- Quarterly inspections are adequate to identify and respond to any problems that may be associated with these facilities and comply with the requirements of Health and Safety Code, Sections 25200.5(k)(1) & (2), and 22 CCR 66265.15(a) and 66265.15(b)(4).
- Less frequent inspections will conserve resources without reducing level of protection of human life and the environment.
- LLNL will implement the Closure Plans for these facilities as soon as DTSC approves them and funding is available.

This letter supersedes our previous communications to you about this subject. Please contact me at (925) 422-9642 if you have any questions regarding this matter.

Sincerely,


Stephanie Goodwin, Division Leader
Radioactive and Hazardous Waste Management

SG/PY:cp

Attachment: Quarterly Inspection Log

Cc: Luz Castillo, DTSC, Berkeley Office

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(925) 422-4750*

PRA05-035

PRA05-035
May 20, 2005

Mr. Mike Stanek

**Subject: Changing Inspection Frequency at Buildings 233, 419 and Area 514
Lawrence Livermore National Laboratory (LLNL)**

bcc w/enclosure:

P. Yimbo	L-627
EPD Docs	
PRA05-035	

bcc w/o enclosure:

M. Abri	L-627
J. Bowers	L-786
K. Cadwell	L-786
P. Epperson	L-623
S. Goodwin	L-623
W. Kao, NNSA/LSO	L-574
S. Kidd	L-786
C. S. Jackson	L-633
S. Mancieri	L-627
R. Michalik	L-633
J. Morris	L-786
K. Rauhut	L-701
V. Salvo	L-623
S. Terusaki	L-627
E. Thomas	L-627

**Quarterly Inspection for Inactive Permitted Facilities Undergoing Closure at
Lawrence Livermore National Laboratory**

Inspector's Name (print): _____ **Date:** _____

Instructions: Write "Y" for "yes" and "N" for "no" for each facility. Write "NA" if not applicable.

GENERAL FACILITY	CSU 253	Building 419	Area 514
1. Are all access points posted with the appropriate warning signs, and are the signs legible from 25 feet away?			
2. Are all gates/doors secured to prevent unauthorized entry?			
3. Is there no storm water run-off from the facility?			

Additional comments or issues observed during inspection:

Inspector's Signature: _____

Facility Responsible Individual (signature): _____ Date: _____

NOTE:

There are no waste activities (i.e., handling, processing, repackaging, storage or staging) being performed in these areas. Based on these facilities being inactive, all emergency equipment, including eye washes/showers, telephones, fire extinguishers and spill kits, have been removed or deactivated.

In the event that waste is generated during closure activities, all emergency equipment will be returned and/or reactivated. Proper waste storage and staging areas will be established, and required inspections will be conducted.